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July 8, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street  
Washington, D.C. 20554

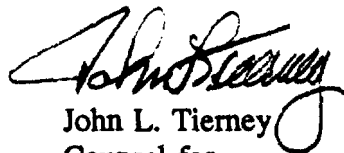
Re: MM Docket Nos. 91-22, 87-8, 94-150, and 87-154  
Response to FCC Request for Information Regarding  
Television Local Marketing Agreements  
Raleigh-Durham, North Carolina Market

Dear Sir:

Forwarded herewith, on behalf of Carolina Broadcasting System, Inc., the permittee of UHF Television Broadcast Station WRAZ-TV, Channel 50, Raleigh, North Carolina is an original and four copies of its response in the above-referenced proceeding to the Commission's Public Notice released June 17, 1997, DA 97-1246, requesting information regarding LMA's

Any questions which may arise concerning this submission should be directed to the undersigned.

Very truly yours,



John L. Tierney  
Counsel for  
Carolina Broadcasting System, Inc.  
(WRAZ)

JLT:dab  
enclosure

Hand of Charles Ford  
LRA 78052

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July 2, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street, N.W., Room 222  
Washington, D. C. 20554

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154  
Response to FCC Request for Information Regarding TV  
LMAs  
Raleigh-Durham, North Carolina Market

Dear Mr. Caton:

On behalf of Carolina Broadcasting System, Inc., licensee of Station WRAZ-TV, Channel 50, Raleigh, North Carolina, attached is Carolina Broadcasting's Response to the Commission's June 17, 1997 Public Notice (DA 97-1246) requesting information on TV LMAs. Carolina Broadcasting System, Inc. is party to a Time Brokerage Agreement with Capitol Broadcasting Company, Inc., licensee of WRAL, Channel 5, Raleigh, North Carolina.

If you have questions, please contact our counsel, John Tierney at (202) 293-7979.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas H. Campbell'.

Thomas H. Campbell  
President  
Carolina Broadcasting System, Inc.

cc: Fred Barber, Paul Feldman, Esq., Jack Tierney, Esq.

**TIME BROKERAGE DATA  
RE: WRAZ-TV and WRAL-TV  
RALEIGH, NORTH CAROLINA**

- |   | <u>Brokered Station</u>  | <u>Brokering Station</u>                  |
|---|--|---|
| 1. Permittee/Licensee:                                  | <b>Carolina Broadcasting System, Inc.</b>  | <b>Capitol Broadcasting Company, Inc.</b> |
| Call Letters:   | <b>WRAZ-TV</b>   | <b>WRAL-TV</b>                            |
| Channel:  | <b>50</b>  | <b>5</b>                                  |
| Community of License                                    | <b>Raleigh, NC</b>   | <b>Raleigh, NC</b>                        |
| 2. DMA  | <b>Raleigh-Durham</b>  | <b>Raleigh-Durham</b>                     |
| Rank  | <b>29</b>  | <b>29</b>                                 |
| 3. <u>Degree of Signal Contour Overlap:</u>             |  |   |
|   | 100 percent of the WRAL's City Grade, 100 percent of WRAL's Grade A and 100 percent of WRAL's Grade B contours overlap the respective contours of WRAZ. Conversely, WRAZ's City Grade, Grade A and Grade B Contours overlap approximately 60% of the respective contours of WRAL.  |   |
| 4. <u>Date on Which Parties Entered Into Agreement:</u> |  |   |
|   | Capitol Broadcasting entered into a Time Brokerage Agreement on June 8, 1994 with the then-permittee of Channel 50, Tar Heel Broadcasting, Inc. Channel 50 was subsequently constructed and commenced operation on September 7, 1995. On August 26, 1996, Tar Heel assigned its rights and obligations under the Brokerage Agreement to Carolina Broadcasting System, Inc. |   |
| 5. <u>Term of Agreement:</u>                            |  |   |
|   | The term of the Time Brokerage Agreement is ten (10) years which commenced on June 8, 1994 and will terminate on June 7, 2004.   |   |

6. Percentage of Brokered Hours:

Under the terms of the TBA the permittee has the right to retain twelve hours per broadcast week (7%) for the broadcast of its own religious and public interest programming. At the present time, permittee is actually broadcasting only ½ hour of its own programming each week. Thus, at present, more than 99% of WRAZ's air time is brokered.

7. Network Affiliation:

The Brokered Station (WRAZ) is an affiliate of the WB Network. The Brokering Station (WRAL) is an affiliate of the CBS Network.

8. Nielsen Audience Share  
Mon. - Sun., 9 a.m. - Midnight:

	<u>Brokered Station (WRAZ)</u>	<u>Brokering Station (WRAL)</u>
May 97	2	23
Feb. 97	3	23
Nov. 96:	2	22

9. Other Information:

The permit for WRAZ was transferred to Carolina Broadcasting System, Inc., August 26, 1996. The previous permittee indicated that it was having difficulty in commencing operation of the station without the LMA agreement with Capitol Broadcasting Company, Inc. The station was constructed only after an LMA agreement was entered into.

The brokering station has made significant investments in programming, promotion and public relations, in order to establish both an audience as well as a revenue base which would support the station. This agreement has allowed a new voice to be seen and heard in the market. A nightly half-hour newscast, which is written and aired separately from the brokering station is a significant effort towards establishing WRAZ as a competitive station in the market. Because of these substantial investments, Fox Television Network has agreed to affiliate with WRAZ in 1998, an event which would likely never have occurred otherwise.

As an independent owner and operator, Carolina Broadcasting may not have been

able to afford the operating losses which would have resulted in starting a full-power station in the 29th market in the nation without an LMA agreement. The working relationship could not have been better. Managers and company officers of the brokering station have judiciously avoided intrusion in to the authority of the permittee. When requested, the level of expertise and assistance has been invaluable, allowing the permittee help which it otherwise could not afford. The brokering station has consulted with the permittee in certain instances before contracting for programming, wanting to ensure that the permittee is in agreement with such purchases. The permittee is fully informed of community service and promotional events in which the brokering station intends to participate, and permittee's personnel are invited to participate.

WRAZ's President and General Manager personally writes, produces and hosts a weekly public affairs program, selecting and interviewing persons who respond to issues and needs ascertained to be of importance to the community. The program is aired in prime time. This ensures that the station is addressing topics of interest to the station's primary market.

After almost two years of operation, WRAZ is poised to be a competitive market force. Without the LMA agreement and subsequent infusion of capital which resulted from the agreement, there is little possibility that such would be the case. There is no question that the public interests has been better served as a result of this agreement.